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15 *Attorneys for Debtors and Reorganized Debtors*

16 **UNITED STATES BANKRUPTCY COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18 **SAN FRANCISCO DIVISION**

19 **In re:**

20 **PG&E CORPORATION,**

21 **- and -**

22 **PACIFIC GAS AND ELECTRIC**  
23 **COMPANY,**

24 **Debtors.**

25  Affects PG&E Corporation  
26  Affects Pacific Gas and Electric Company  
27  Affects both Debtors

28 \* *All papers shall be filed in the Lead Case, No.*  
19-30088 (DM).

12 Bankruptcy Case No. 19-30088 (DM)

13 Chapter 11

14 (Lead Case) (Jointly Administered)

15 **DECLARATION OF MELANIE M.**  
16 **BRAYTON IN SUPPORT OF PG&E'S**  
17 **MEMORANDUM OF POINTS AND**  
18 **AUTHORITIES IN OPPOSITION TO**  
19 **CLAIMANT'S SECOND MOTION FOR**  
20 **PARTIAL SUMMARY JUDGMENT**

21 Date: December 19 2023

22 Time: 10:00 a.m. (Pacific Time)

23 Place: (Tele/Videoconference Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

**DECLARATION OF MELANIE M. BRAYTON**

I, MELANIE M. BRAYTON (formerly MELANIE M. HILDEBRAND), declare as follows:

1. I have personal knowledge of the facts and circumstances and can and do competently testify regarding the facts set forth in this declaration.

2. I, together with my husband, Niel Hildebrand, Jr., am the former owner of property identified as 800 Walnut Street, San Bruno, California (the "Property").

3. I, together with my husband, purchased the Property in 1987 through the State of California at a CalTrans auction. I recall the purchase price of the Property was approximately \$60,000.

4. A true and correct copy of the Director's Deed from the State of California to us is attached hereto as Exhibit A.

5. When I purchased the Property, there were overhead transmission lines and a canal that crossed through the Property.

6. I did not consent, verbally or in writing, to the use or maintenance of the overhead electric lines because the easements were recorded against the property and the overhead electric lines existed.

7. Initially, I and my husband planned on developing the Property. We retained a designer, Matt Carpenter of Colma, in furtherance of our intent to develop the Property. Ultimately, we decided not to develop the Property.

8. We sold the Property to Komir, Inc., in 2000. A true and correct copy of the two deeds granting the property to Komir, Inc. are attached hereto as Exhibits B and C. The grant deed dated July 5, 2000 (Exhibit B) transferred title. The grant deed dated December 18, 2000, corrected the title (formally referring to the property as Parcel One and Parcel Two).

9. I recall the sale of the Property to Komir, Inc. being made through an individual named John Kokas. I do not recall meeting anyone by the name of Amir Shahmirza in relation to the sale of the Property.

1       10. I do not recall having any discussion with Mr. Kokas regarding potential  
2 development of the Property.

3       11. My recollection is that I and my husband sold the Property to Komir, Inc.  
4 for approximately \$350,000.

5       I declare under penalty of perjury under the laws of the United States that the  
6 foregoing is true and correct.

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8       Executed this 30<sup>th</sup> day of October 2023 at Petaluma, California.

9       By: \_\_\_\_\_  
10       Melanie M. Brayton  
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